

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**ANIL KUMAR, MANOJ KUMAR,
and MANDEEP SINGH**

Defendants.

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CASE NO.

Plaintiff, United States of America, for its Complaint against Anil KUMAR, Manoj KUMAR, and Mandeep SINGH [the Respondents], alleges as follows:

1. The Court has jurisdiction pursuant to 28 U.S.C. § 1345.

The Respondents are citizens of India who are currently detained by the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement (ICE) at the Stewart Detention Center (SDC) in Lumpkin, Georgia. The Respondents are currently awaiting hearings on their removability back to India. See Attached Declaration of Traci Horrach.

2. The Respondents are currently engaged in a hunger strike in which they are refusing nutrients necessary to sustain their life. The Respondents have refused to eat food since April 17, 2018. The Respondents are refusing to cooperate with the medical staff at SDC, to wit: refusing nutrients, medical tests, and medication necessary to sustain their life.

3. Plaintiff has made reasonable efforts to persuade the Respondents to cooperate, to no avail. See Attached Declaration of Traci Horrach.

4. Plaintiff intends to involuntarily administer nutrients to the Respondents in order to sustain their life and to preserve order and security. Plaintiff also intends to perform laboratory tests and physical evaluations to monitor and assess the Respondents clinical condition (i.e., drawing of blood and urinalysis for laboratory testing, physical examination, and administration of medications, if necessary). Restraints may be needed to accomplish this involuntary monitoring, treatment and administration of nutrients. See Attached Declaration of Dr. Eugene G. Charbonneau, D.O.

WHEREFORE, Plaintiff requests that the Court enter judgment allowing Plaintiff to perform laboratory tests and physical evaluation and to involuntarily administer nutrients and fluids to the Respondents by nasogastric tube and/or intravenously to sustain their life, including the use of restraints, until the Respondents decide to discontinue their hunger strike.

Respectfully submitted, this 16th day of May, 2018.

CHARLES E. PEELER
UNITED STATES ATTORNEY

BY: s/ Bernard Snell
BERNARD SNELL
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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2018, I electronically transmitted the attached **Complaint** to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants: N/A

I hereby further certify that on May 16, 2018, I served the attached document by in-person delivery or via first class mail on the following non-CM/ECF participant:

Anil KUMAR – A XXX XXX 785
Manoj KUMAR – A XXX XXX 747
Mandeep SINGH – A XXX XXX 679
Stewart Detention Center
146 CCA Road
P.O. Box 248
Lumpkin, GA 31815

This 16th day of May, 2018.

BY: s/ Bernard Snell
BERNARD SNELL
ASSISTANT UNITED STATES ATTORNEY